

EXHIBIT A
REDACTED VERSION OF DOCUMENT
SOUGHT TO BE FILED UNDER SEAL

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8 **UNITED STATES DISTRICT COURT**
9 **NORTHERN DISTRICT OF CALIFORNIA**
10 **SAN FRANCISCO DIVISION**

11 IN RE: FACEBOOK, INC. CONSUMER
12 PRIVACY USER PROFILE LITIGATION,

13 This document relates to:

14 ALL ACTIONS
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MDL NO. 2843

CASE NO. 3:18-MD-02843-VC-JSC

HON. VINCE CHHABRIA
HON. JACQUELINE SCOTT CORLEY
COURTROOM 4 – 17TH FLOOR
SPECIAL MASTER, DANIEL GARRIE, ESQ.

**ORDER FOLLOWING MAY 17, 2022
HEARING REGARDING PRODUCTION
OF NAMED PLAINTIFF DATA**

No later than June 2, 2022, Facebook is to submit responses to the following questions and provide the requested additional information.

- How did Facebook identify the Hive tables in Exhibit B to Facebook's April 11, 2022 submission ("Exhibit B") identified as possibly containing user identifiers? Facebook's answer is to include technical details about the process used to identify the Hive tables.
- Can Facebook provide descriptions for the Hive tables identified in Exhibit B? If so, provide the descriptions.
- How long would it take to extract the column names and data types (schema) for the Hive tables identified in Exhibit B? Facebook's answer is to include a description of the processes and steps it would need to perform to provide the requested data.
- Did Facebook's search to identify the tables set out in Exhibit B include searching cold storage? If not, why not?
- In Exhibit B to Facebook's April 18, 2022 letter submission (Declaration of Mengge Ji), Mengge Ji states [REDACTED]
[REDACTED] Expand on this statement, include descriptions of the [REDACTED] databases, and clarify what is meant by "databases" in this context.
- One of Facebook's responses in their April 11, 2022 letter submission at page 2 states "tables believed to contain data that that is either duplicative or transformed." What does transformed mean in this context? Facebook's answer is to include three examples of "transformation."
- Facebook's April 11, 2022 letter submission at page 2 refers to six categories of tables that were not included in the list in Exhibit B: (1) temporary, test, and error tables; (2) tables used to evaluate system performance; (3) tables that contain no data; (4) tables related to other Meta products (e.g., Oculus, Instagram, and WhatsApp); (5) tables used for infrastructure, operations,


1 and product testing; and (6) tables believed to contain data that is either duplicative or
2 transformed. Provide a description of each of these six categories of tables.

3 No later than May 30, 2022, Facebook is to provide the revised proposal they discussed at the
4 hearing.

5 No later than June 6, 2022, the parties are to submit briefs, not to exceed five (5) pages not
6 including exhibits, on the issues of Hive table selection, production of data related to apps installed by
7 friends of Named Plaintiffs, and whether Facebook should be compelled to search cold storage for
8 Named Plaintiff data.
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11 IT IS SO ORDERED.

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13 Tuesday, May 24, 2022

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Daniel Garrie
Discovery Special Master